

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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RUDOLPH RAAB d/b/a RAAB INVESTMENTS,  
and R & W LODGING, LIMITED LIABILITY  
COMPANY,

Plaintiffs,

-vs-

File No. \_\_\_\_\_

MICHAEL C. WENDEL, individually and d/b/a  
THE WENDEL GROUP INC., WENDEL  
COMPANIES, LLC, WENDEL ENTERPRISES,  
LLC, WENDEL INVESTMENTS, LLC, WENDEL  
HOSPITALITY, LLC, WENDEL INVESTMENTS,  
INC., SAND COMPANIES, INC., SAND  
HOSPITALITY, LLC, SCI HOTELS, LLC,  
MICHAEL C. WENDEL, d/b/a WEST BEND  
HOSPITALITY, INC.,  
WEST BEND HOSPITALITY, INC.,  
LEO M. SAND, individually and d/b/a SAND  
HOSPITALITY, LLC, SAND COMPANIES, INC.,  
and SCI HOTELS, LLC,  
SAND HOSPITALITY, LLC,  
SAND COMPANIES, INC., and  
SCI HOTELS, LLC,

Walworth County, Wisconsin, Circuit Court  
Case No. 14-CV-657

Defendants.

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**DEFENDANTS' NOTICE OF REMOVAL**

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**PLEASE TAKE NOTICE** that Defendants, Michael Wendel, The Wendel Group, Inc., Wendel Companies, LLC, Wendel Enterprises, LLC, Wendel Investments, LLC, Wendel Hospitality, LLC, Wendel Investments, Inc., Sand Companies, Inc., West Bend Hospitality, Inc., Leo M. Sand, Sand Hospitality, LLC, Sand Companies, Inc., and SCI Hotels, LLC, (collectively, "Defendants"), pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, hereby

remove Walworth County, Wisconsin, Circuit Court Case No. 14-CV-657 (“Case No. 14-CV-657”) from the circuit court to the United States District Court, Eastern District of Wisconsin. In support of this removal, Defendants state as follows.

1. On September 21, 2016, Plaintiffs, Rudolph Raab and R&W Lodging, Limited Liability Company (collectively, “Plaintiffs”), filed a first amended complaint in Case No. 14-CV-657 against Defendants.

2. The amended summons and first amended complaint were served on Defendants on September 21, 2016, copies of which are attached hereto as Exhibits 1 and 2 respectively.

3. Plaintiffs’ amended complaint alleges violations of the Racketeer Influenced and Corrupt Organizations Act (RICO), 18 U.S.C. §§ 1962, *et. seq.* This Court has jurisdiction over civil actions arising under the laws of the United States. 28 U.S.C. § 1331.

4. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal has been filed within 30 days of the date that Plaintiffs’ amended summons and first amended complaint were served on Defendants.

5. The Circuit Court for the State of Wisconsin, Walworth County, where this action is currently pending, is located within the Eastern District of Wisconsin.

6. Defendants have simultaneously filed a copy of this Notice of Removal with the Clerk of the Circuit Court of Walworth County, Wisconsin, and have served a copy of this Notice of Removal upon legal counsel for Plaintiffs, as required by 28 U.S.C. §1446(d).

**WHEREFORE**, Defendants respectfully request that this action be removed to this Court, pursuant to 28 U.S.C. § 1441, *et seq.*

Dated this 18<sup>th</sup> day of October, 2016.

GODFREY, LEIBSLE, BLACKBOURN &  
HOWARTH, S.C.  
Attorney for Defendants

By: s/Lisle W. Blackbourn  
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